

**Comments for Draft Revisions *(Not Applicable to Directives; Refer to Directive Management Officer for Directive Comment Format)***

[For detailed instructions on how to fill out the columns below, please see the Instructions sheet.](#)

<b>Comments Submitted By:</b>			Joan Hughson					
<b>Organization:</b>			AIR-100, Branch AIR-130, Section 133					
<b>Phone:</b>			202-267-1608					
#	Document Name	Page Number	Paragraph Number	Referenced Text	Comment/Rationale or Question	Proposed Resolution	Comment Type (Conceptual, Editorial, or Format)	Disposition/Response to Comment
ACE	TSO-C202 (draft 6/17/15) comment by: HH	1	3	"except 1, 4.3.1, 5 and 6"	4.3.2 does not make sence as without 4.3.1 (Flam requirements are in TSO para 3.g)	"except 1, 4.3, 5 and 6"	Editorial	Agree. Change incorporated. Sections 3.7 and 4.3 have also been excepted because their requirements are also covered by 3.g of the TSO
ACE	TSO-C202 (draft 6/17/15) comment by: HH	2	2.d(1)	Consider environmental degradation due to aging, ultra-violet (UV)-exposure, weathering, etc., for any materials used in the construction of cargo stopper devices.	Too vague. Nothing here that isn't covered in para 2.d(2)	Delete 2.d(1) and remove subparagraph number from what's now 2.d(2) so what remains is pars 2.d	Conceptual Editorial	Disagree. Section 2.d(1) calls for the consideration of environmental influences for any material. Not all materials are covered in Section 2.d(2) by (AIR) 1490B.
ACE	TSO-C202 (draft 6/17/15) comment by: HH	2	2.e	None	does not exist	renumber para 2.f and 2.g	Editorial	Agree. Change incorporated.

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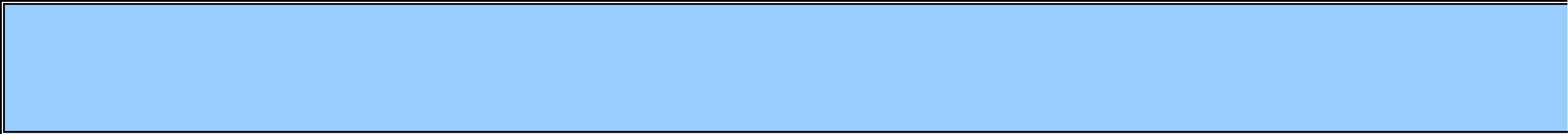
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ACE	TSO-C202 (draft 6/17/15) comment by: HH	3	5.a(3) Note Last sentence	Installation of this article requires separate approval.	Installation is covered by the main body of Para 5.a. Usually a TSO article is installed on aircraft at least as a temporary change. hence, while the TSOA provides design and production approval of the article, the installation requires separate approval. In this case, the article is used on the aircraft, but is not installed as such. The installation consisting of hooking into existing restraints according to the instructions provided does not require any approval, but does require usage/installaton instructions per 5.a. Otherwise, clarification is necessary as to what is meant by "installation".	Delete last sentence	Editorial	Out of Scope. Section 5.a covers manual contents requirements. It is a standard part of the TSO and cannot be changed.
ACE	TSO-C202 (draft 6/17/15) comment by GKN	1	3	Lising of the SAE spec and its exclusions	Has this SAE ASG6554 already been vetted by FAA personnel, or is this comment request asking us to review the SAE document as well?	If comments aren't needed on SAE document, no further action is needed. If ACO review is also requested for the SAE document, the SAE document should be attached and specific comments requested.	Conceptual	Answer. No comments are requested on the SAE document.
ACE	TSO for Cargo Stopper Devices	1	3	...must meet the MPS qualification and documentation requirements in SAI International (SAE) Aerospace Standard AS6554 Cargo Stopper Devices dated July 2011,...	Not possible to evaluate TSO without the SAE standard.	Send AS6554 with TSO for comments		Disagree. Instructions on how to obtain the SAE document were sent with the clearance record.

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ACE	TSO for Cargo Stopper Devices	2	3.d(2)	...see SAE Aerospace Information Report (AIR) 1490B Environmental Degradation of textiles, dated December 2007....	Not possible to evaluate TSO without the report.	Send AIR 1490B with TSO for comments		Disagree. Instructions on how to obtain the SAE document were sent with the clearance record.
		Jeff Duven						
		ANM-100						
ANM	TSO C202	1	para 3.b.		In order to use this TSO, the Weight and Balance Manual needs to specify its use. With no minimum standard published, this is not possible. The TSO needs to define enough data such that a TC holder or STC applicant can define how this TSO can restrain cargo to meet the applicable airworthiness standards. Suggest developing a table of allowable loads based on a varying size of a blunt object. This could enable an applicant to define how the TSO Cargo Stopper Device could be used.	Have the TSO define how the TSO can restrain cargo to meet the applicable airworthiness standards.	Conceptual	Disagree. This request is outside the scope of the TSO. The TSO is meant to address minimum performance requirements only.
ANM	TSO C202	2	para 4		The marking should include the rated strength similar to TSO C-172 paragraph 4.e. Otherwise, this stopper is not usable.	See comment	Conceptual	Accepted. Change incorporated.
ANM	TSO C202	2	para 4		Require marking of manufacture and expiration date similar to TSO C-172 Paragraph 4.d. This information is needed to assist in determination of continued airworthiness.	See comment	Conceptual	Partially accepted. Added the expiration date to the TSO. The date of manufacture is not the critical
ANM	TSO C202	6	para 6		Delete this paragraph. There is no electrical wiring.	See comment	Editorial	This section of the TSO comes directly from the TSO Template and cannot be changed.

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ANM	Cargo Stopper Devices, TSO C-202	1	3	"New models of cargo stopper devices..."	Recognizing that this is probably boiler plate language to address the case where a TSO is revised, it seems out of place for a new TSO.	Recommend deleting "new" and just stating "Cargo stopper devices..."	Editorial	Disagree. There are existing models of cargo stoppers being manufactured without a TSO.
ANM	Cargo Stopper Devices, TSO C-202	1	3.a	Lead in text	Implies that the device would only be used in the listed conditions	if it really is limiting, so state; if not, add 'for example' between 'used' and 'in'	Editorial	Disagree, This paragraph is meant to define functionality, not specific requirements in how cargo stopper devices are used. The examples given are related to installation, which is out of scope as part of the TSO. The TSO addresses the minimum performance specification for the part only.
ANM	Cargo Stopper Devices, TSO C-202	1	3	"...except for sections 1, 4.3.1, 5 and 6."	This excludes certain paragraphs of the AS, however, paragraph 3.c., requires that the device meet one of those paragraphs (4).	Reconcile the apparent conflict by repeating the exclusion of specific paragraphs. E.g., c. Functional Qualification. Demonstrate the required functional performance under the test conditions specified in SAE AS6554 paragraph 4, <u>except paragraph 4.3.1.</u>	Editorial	Intent incorporated.
ANM	Cargo Stopper Devices, TSO C-202	2	3.g	whole paragraph	14 CFR part 25 requires cargo tie down equipment to meet the slightly more severe 2.5"/minute burn rate test, whereas the TSO only requires a 4"/minute burn rate.	Either change the requirement to match part 25, or note that the standard does not actually comply with part 25, and therefore is not installable on a transport category airplane without further testing.	Conceptual	Agree. Change incorporated.



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ANM	Cargo Stopper Devices, TSO C-202	N/A	N/A	General	While it seems like a good idea to have standards for this type of device, there is no indication of how it would actually be effectively used. That is, how and to what does it attach, and are the attachment points rated for the same loads as the cargo stopper device.	Have the TSO document that changes to the WBM require an amended TC, or an STC.	Conceptual	Disagree. This request is outside the scope of the TSO. The TSO is meant to address minimum performance requirements only.